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September 16, 2020

**VIA ECF**

Hon. Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

Re: *Miguel Angel Suarez, et. al. v. Brasserie Felix, Inc., et al.*, Case No. 19 Civ. 7210 (KPF)

Dear Judge Vyskocil:

Our firm represents the Defendants in the above-referenced action. We write to inform Your Honor and Plaintiffs that Defendants Brasserie Felix, Inc., Alexandre Catteau, and Alain Denneulin (the "Defendants" or "Debtors") have recently filed for Chapter 11 bankruptcy protection in the Eastern District of New York for the second time. We have attached the Notices of Bankruptcy Case Filings for the Corporate and Individual Defendants. The bankruptcy cases have been accorded case numbers 1-20-42824-ess (Brasserie Felix Inc.), 1-20-43260-ess (Catteau), and 1-20-43261-ess (Denneulin). As a result of the bankruptcy filings, Defendants respectfully ask the Court to stay this action.

Pursuant to section 362(a) of the Bankruptcy Code, the Debtors' filing of its bankruptcy petitions operate as a stay of—among other things: (a) the continuation of all judicial or other proceedings against the Debtors (i) that were or could have been commenced before the commencement of the Debtor's case, or (ii) to recover any claims against the Debtors that arose before the commencement of the Debtors' case; (b) the enforcement, against the Debtors or against any property of the Debtors' bankruptcy estate, of a judgment obtained before the commencement of the Debtor's case; or (c) any act to obtain possession of property of or from the Debtor's bankruptcy estate, or to exercise control over property of the Debtor's bankruptcy estate. *See* 11 U.S.C. § 362(a).

We therefore request that Your Honor stay this entire matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eli Z. Freedberg".

Eli Z. Freedberg

cc: Peter Cooper, Esq.

United States Bankruptcy Court  
Eastern District of New York

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 09/09/2020 at 09:28 AM and filed on 09/09/2020.

**Alexandre Catteau**  
91-93 Metropolitan Avenue  
Brooklyn, NY 11211  
SSN / ITIN: xxx-xx-2247



The case was filed by the debtor's attorney:

**Lawrence Morrison**  
87 Walker Street Floor 2  
New York, NY 10013  
212-620-0938

The case was assigned case number 1-20-43260-ess to Judge Elizabeth S. Stong.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <https://ecf.nyeb.uscourts.gov/> or at the Clerk's Office, 271-C Cadman Plaza East, Suite 1595, Brooklyn, NY 11201-1800.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Robert A. Gavin, Jr.**  
**Clerk, U.S. Bankruptcy Court**

<b>PACER Service Center</b>
<b>Transaction Receipt</b>
09/14/2020 14:46:57

<b>PACER Login:</b>	lfmorrison2007:2588979:0	<b>Client Code:</b>	
<b>Description:</b>	Notice of Filing	<b>Search Criteria:</b>	1-20-43260- ess
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10

United States Bankruptcy Court  
Eastern District of New York

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 09/09/2020 at 09:42 AM and filed on 09/09/2020.

**Alain Denneulin**  
1680 York Avenue  
Apt 5E  
New York, NY 10128  
SSN / ITIN: xxx-xx-2538



The case was filed by the debtor's attorney:

**Lawrence Morrison**  
87 Walker Street Floor 2  
New York, NY 10013  
212-620-0938

The case was assigned case number 1-20-43261-ess to Judge Elizabeth S. Stong.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <https://ecf.nyeb.uscourts.gov/> or at the Clerk's Office, 271-C Cadman Plaza East, Suite 1595, Brooklyn, NY 11201-1800.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Robert A. Gavin, Jr.**  
**Clerk, U.S. Bankruptcy Court**

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<b>PACER Service Center</b>
<b>Transaction Receipt</b>
09/14/2020 14:47:28

<b>PACER Login:</b>	lfmorrison2007:2588979:0	<b>Client Code:</b>	
<b>Description:</b>	Notice of Filing	<b>Search Criteria:</b>	1-20-43261- ess
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10

United States Bankruptcy Court  
Eastern District of New York

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 07/31/2020 at 12:26 PM and filed on 07/31/2020.

**Brasserie Felix Inc.**  
340 W Broadway  
New York, NY 10013  
Tax ID / EIN: 13-3631478



The case was filed by the debtor's attorney:

**Lawrence Morrison**  
87 Walker Street Floor 2  
New York, NY 10013  
212-620-0938

The case was assigned case number 1-20-42824-ess to Judge Elizabeth S. Stong.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <https://ecf.nyeb.uscourts.gov/> or at the Clerk's Office, 271-C Cadman Plaza East, Suite 1595, Brooklyn, NY 11201-1800.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Robert A. Gavin, Jr.**  
**Clerk, U.S. Bankruptcy Court**

<b>PACER Service Center</b>
<b>Transaction Receipt</b>
09/15/2020 16:23:55

<b>PACER Login:</b>	lfmorrison2007:2588979:0	<b>Client Code:</b>	
<b>Description:</b>	Notice of Filing	<b>Search Criteria:</b>	1-20-42824- ess
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10